

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SAVANNAH KINZER, HALEY EVANS, and
CHRISTOPHER MICHNO,

Plaintiffs,

v.

WHOLE FOODS MARKET, INC.,

Defendant.

CIVIL ACTION NO. 1:20-cv-11358-ADB

JOINT MOTION TO CONTINUE STATUS CONFERENCE

Plaintiffs Savannah Kinzer, Haley Evans, and Christopher Michno (collectively, “Plaintiffs”) jointly with Defendant Whole Foods Market, Inc. (“Whole Foods”) (collectively with Plaintiffs, the “Parties”) request that the Court continue the status conference scheduled for November 8, 2021 and reschedule it for November 12, 2021 or as soon thereafter as is mutually agreeable to the Court and the Parties. As grounds for this Motion, the Parties state as follows:

1. On October 14, 2021, the Parties submitted letters to the Court requesting a conference regarding certain discovery disputes. Dkt. Nos. 85-86.
2. On November 2, 2021, the Court issued an order scheduling a status conference for November 8, 2021. Dkt. No. 89.
3. Counsel for Whole Foods has a business-related scheduling conflict and will be traveling on November 8, 2021.
4. The Parties have conferred and are available for a status conference on November 12, 2021 at any time convenient for the Court.
5. This is the first request for a continuance of a status conference scheduled by the Court.

WHEREFORE, the Parties request that the Court continue the status conference currently scheduled for November 8, 2021.

WHEREFORE, the Parties further request that the Court re-schedule the status conference for November 12, 2021 or as soon thereafter as is mutually agreeable to the Court and the Parties.

SAVANNAH KINZER, HALEY EVANS,
and CHRISTOPHER MICHNO

DEFENDANTS WHOLE FOODS
MARKET, INC.

By their attorneys,

By its attorneys,

/s/ Anastasia Doherty

Shannon Liss-Riordan, BBO #640716
sliss@llrlaw.com
Anastasia Doherty, BBO #705288
adoherty@llrlaw.com
LICHTEN & LISS-RIORDAN, P.C.
729 Boylston Street, Suite 2000
Boston, MA 02116
(617) 994-5800

/s/ Julie V. Silva Palmer

Julie V. Silva Palmer, BBO# 676788
julie.palmer@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
One Federal Street
Boston, Massachusetts 02119
Telephone: (617) 341-7277
Facsimile: (617) 341-7701

Anne Marie Estevez (*pro hac vice*)
annemarie.estevez@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
200 South Biscayne Boulevard, Suite 5300
Miami, Florida 33131
Telephone: (305) 415-3000
Facsimile: (305) 415-3001

Michael L. Banks (*pro hac vice*)
michael.banks@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, Pennsylvania 19103
Telephone: (215) 963-5000
Facsimile: (215) 963-5001

Terry D. Johnson (*pro hac vice*)
Jason J. Ranjo (*pro hac vice*)
terry.johnson@morganlewis.com
jason.ranjo@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
502 Carnegie Center
Princeton, New Jersey
Telephone: (609) 919-6600
Facsimile: (609) 919-6701

Attorneys for Defendant

Dated: November 4, 2021

LOCAL RULE 7.1 CERTIFICATION

Whole Foods' counsel hereby certifies that the parties conferred regarding the subject of this motion and jointly request that it be granted.

/s/ Julie Silva Palmer
Julie Silva Palmer

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 4, 2021.

/s/ Julie Silva Palmer
Julie Silva Palmer